

United States of America, ex rel. Cameron Jehl vs GGNSC Southaven, LLC, et al.
30(b)(6) Kynda Almefty on 03/16/2021

1 IN THE UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF MISSISSIPPI
3 UNITED STATES OF AMERICA, ex)
4 rel. CAMERON JEHL,) ORIGINAL
5 PLAINTIFFS,)
6 VS.) CASE NO.
7) 3:19-CV-091-MPM-JMV
8 GGNSC SOUTHAVEN LLC D/B/A)
9 GOLDEN LIVING CENTER-)
10 SOUTHAVEN; GGNSC)
11 ADMINISTRATIVE SERVICES LLC)
12 D/B/A GOLDEN VENTURES; AND)
13 GGNSC CLINICAL SERVICES LLC)
14 D/B/A GOLDEN CLINICAL)
15 SERVICES,)
16 DEFENDANTS.)

11 -----
12 ORAL AND VIDEOTAPED 30(b)(6) DEPOSITION OF
13 KYNDA ALMEFTY, ON BEHALF OF
14 GGNSC ADMINISTRATIVE SERVICES, LLC
15 MARCH 16, 2021
16 -----

17 ORAL AND VIDEOTAPED 30(b)(6) DEPOSITION OF
18 KYNDA ALMEFTY, ON BEHALF OF GGNSC ADMINISTRATIVE
19 SERVICES, LLC, produced as a witness at the instance
20 of the RELATOR, CAMERON JEHL, and duly sworn, was
21 taken in the above-styled and numbered cause on the
22 16th of March, 2021, from 9:06 a.m. to 2:10 p.m.,
23 before Jennifer Norman, CCR in and for the State of
24 Arkansas, reported by machine shorthand, pursuant to
25 the Federal Rules of Civil Procedure.

1 (Whereupon, the witness was duly sworn.)

2 MR. SANDERS: Ms. Norman, are you doing
3 any type of read-in, or are we just
4 getting -- getting started?

5 THE COURT REPORTER: We don't do that in
6 Arkansas. The videographer may, but the
7 court reporters here in Arkansas don't do a
8 read-in.

9 MR. SANDERS: Okay. Who -- is it
10 DeAndrae? Are you doing a read-in, or
11 should we just get started?

12 THE VIDEOGRAPHER: Well, the witness is
13 already sworn.

14 MR. SANDERS: Okay.

15 THE VIDEOGRAPHER: If you would like me
16 to, I can.

17 MR. SANDERS: Well, why don't I do this?
18 I'll just -- we'll -- let's start with the
19 appearances and then we'll go.

20 So this is the Nathan Sanders from Neal
21 & Harwell on behalf of the Relator.

22 MR. LUCKETT: Bill Lockett here, same,
23 Plaintiff.

24 MS. GRATZ: And Margaret Gratz and
25 Robert Salcido on behalf of Defendants.

1 KYNDA ALMEFTY,
2 having been first duly sworn, testified as follows:

3 EXAMINATION

4 BY MR. SANDERS:

5 Q. Ms. Almefty, thanks again for being here today.

6 As I mentioned, my name is Nathan Sanders, and I
7 represent the Relator in this lawsuit.

8 A. Good morning.

9 Q. Good morning. What's your full name?

10 A. Kynda, K-y-n-d-a; last name is Almefty,
11 A-l-m-e-f-t-y.

12 Q. Are you an employee of GGNSC Administrative
13 Services?

14 A. I am not currently.

15 Q. Were you at one time an employee of GGNSC
16 Administrative Services?

17 A. Yes, one time years ago.

18 Q. How long ago was it that you were an employee of
19 that company?

20 A. I was trying to remember that the other day. I
21 think probably about ten years ago now.

22 Q. So you were last an employee in 2011, you think?

23 A. Approximately, yeah.

24 Q. As we're talking today, so it doesn't take eight
25 hours, I may refer to "GGNSC Administrative Services"

1 as just "Admin."

2 Will you understand what I mean if I use
3 that shortened term?

4 A. Yes.

5 Q. What was your position with Admin when you were at
6 the company?

7 A. I was associate counsel in litigation.

8 Q. Is litigation -- was that a separate department at
9 Admin?

10 A. It was a department within Admin.

11 Q. Was the litigation group within a legal
12 department?

13 A. Yes.

14 Q. What was your -- what were your job duties within
15 that litigation department?

16 A. They varied. I would assist the facilities with
17 any legal matters they had and also work with outside
18 counsel on pending lawsuits.

19 Q. When you say "assist the facilities," what
20 facilities are you referring to?

21 A. Oh, I think at the time there was 200 of them.

22 Q. So Admin was providing services to all of the
23 Golden Living facilities operating in the United
24 States?

25 A. Yes.

1 that you please answer any pending questions before we
2 take a break. Okay?

3 A. Yes.

4 Q. And you understand that you are under oath today?

5 A. Yes.

6 (Exhibit 1 marked for identification.)

7 MR. SANDERS: Okay. This will be my
8 first screenshare attempt for the day, and
9 we'll mark this as Exhibit 1. This is the
10 notice, Margaret, the Admin notice.

11 MS. GRATZ: Thank you. And I forwarded
12 a copy of that to Ms. Almefty. So she may
13 have it in front of her, too --

14 MR. SANDERS: Okay.

15 MS. GRATZ: -- if you have any
16 difficulties.

17 Q. Ms. Almefty, can you see my screen?

18 A. Yes.

19 Q. And you recognize this document?

20 A. Yes.

21 Q. This is the 30(b)(6) notice that you reviewed
22 prior to today's deposition?

23 A. Correct. Or so it appears, yes.

24 Q. And I'll kind of scroll -- scroll down through it
25 so you can actually see what's in it. But I'm going

1 to go down to Page 3. Do you see where it says,

2 "Rule 30(B)(6) topics"?

3 A. Yes.

4 Q. And, again, I'll just scroll slowly. But have you
5 reviewed each of these topics in preparation for
6 today's deposition?

7 A. Yes.

8 Q. And you're here to -- on behalf of Admin to answer
9 questions about these topics?

10 A. Yes.

11 Q. Are you fully prepared to provide testimony about
12 all of Admin's corporate knowledge regarding these
13 topics?

14 A. Yes.

15 Q. And you have full authority to speak on behalf of
16 Admin about these topics?

17 A. Correct.

18 Q. And you understand the answers you give to my
19 questions on these topics will be binding on Admin?

20 A. I do.

21 Q. Are you being compensated for your testimony
22 today?

23 A. I will be, yes, billing my time.

24 Q. Do you know what entity will be paying for your
25 time today?

1 A. That, I do not know.

2 Q. And tell me where you need me to scroll. But my
3 next question is: Are you going to be testifying
4 based on personal knowledge that you have with respect
5 to any of these topics today?

6 A. I mean, some of the knowledge I have is from my
7 work with GGNSC Administrative Services. So I don't
8 know if you call that personal knowledge or not.

9 Q. Well, I'll try to ask it a different way. What
10 did you -- what did you do to prepare for your
11 deposition today on these topics?

12 A. I reviewed the notice, I reviewed certain
13 documents, I had a conversation with Margaret -- two
14 conversations with Margaret. I think that's --

15 Q. How many times do you think you talked to
16 Ms. Gratz to prepare for this 30(b)(6) deposition?

17 A. I think probably twice. Maybe a brief
18 conversation to set up some scheduling issues, but
19 nothing substantive.

20 Q. So only two substantive conversations?

21 A. That I'm recalling, yes.

22 Q. When was the first substantive conversation that
23 you remember having?

24 A. Last week. Sorry. It's been a long week. I want
25 to say Monday.